

3:20-0436

Russell Greer  
7901 South 3200 West  
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[russmark@gmail.com](mailto:russmark@gmail.com)  
Pro Se Litigant

**FILED**  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TENN.

MAY 26 REC'D 2020

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IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION

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**RUSSELL G. GREER,**

Plaintiff

v.

**TAYLOR A. SWIFT,**

Defendant

Case No.:

Judge:

**JURY DEMAND**

**ERRATA  
TO PLAINTIFF'S COMPLAINT  
FOR DECLARATORY RELIEF**


### NOTICE OF ERRATA

On May 21<sup>st</sup>, Plaintiff filed a Complaint for Declaratory Relief. Through his own negligence, he failed to sign the Complaint with a signature, although he included an “s-signature”. To be in accordance with *Rules of Civil Procedure 11*, Plaintiff includes a signed signature in EXHIBIT A.

Respectfully submitted,

DATED: May 18th, 2020

Respectfully submitted,

By:   
Russell Greer  
Pro Se Litigant  
/rgreer/

**EXHIBIT A**

### **TRIAL BY JURY**

114. Russell Greer hereby requests trial by jury on all issues wherein trial by jury is permissible.

### **PRAYER FOR RELIEF**

WHEREFORE, Russell Greer prays for judgment against Taylor Swift as follows:

- (1) Compensatory damages in the amount of two million dollars.
- (2) General and special damages to be found by a jury in accordance with the facts, for the jury to find up to twenty million dollars.
- (3) An award of pre and post-judgment interest;
- (4) Russell Greer be awarded trial by jury on all issues triable by jury; and
- (5) Such other and further relief as the Court deems just and proper.




Respectfully submitted,

DATED: May 12th, 2020

Respectfully submitted,

By:

Russell Greer  
Pro Se Litigant  
/rgreer/

## CIVIL COVER SHEET

3:20-cv-436

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Greer, Russell G.

(b) County of Residence of First Listed Plaintiff Salt Lake County, UT  
(EXCEPT IN U.S. PLAINTIFF CASES)

Russell Greer, Pro Se Litigant  
7901 South 3200 West  
P.O. Box 152  
West Jordan, Utah 84088  
801-895-3501  
russmark@gmail.com

(c) Attorneys (Firm Name, Address, and Telephone Number)  
P.O. Box 152  
West Jordan, Utah 84088  
801-895-3501  
russmark@gmail.com

## DEFENDANTS

Swift, Taylor A.

County of Residence of First Listed Defendant Davidson  
(IN U.S. PLAINTIFF CASES) County, TN

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |   |                                       |
|---|---------------------------------------|---|---------------------------------------|
| PTF                                     | DEF                                   | PTF   | DEF                                   |
| <input type="checkbox"/> 1              | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 4                                    | <input checked="" type="checkbox"/> 4 |
| Citizen of This State                   |                                       | Incorporated or Principal Place of Business In This State     |                                       |
| <input checked="" type="checkbox"/> 2   | <input type="checkbox"/> 2            | <input type="checkbox"/> 5                                    | <input type="checkbox"/> 5            |
| Citizen of Another State                |                                       | Incorporated and Principal Place of Business In Another State |                                       |
| <input type="checkbox"/> 3              | <input type="checkbox"/> 3            | <input type="checkbox"/> 6                                    | <input type="checkbox"/> 6            |
| Citizen or Subject of a Foreign Country |                                       | Foreign Nation  |                                       |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1332,

## VI. CAUSE OF ACTION

Brief description of cause:

Defendant failed to warn with her publicity stunts, thus harming plaintiff.

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

22 million dollars

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 05/09/2020 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

Case 3:20-cv-00436 Document 4 Filed 05/26/20 Page 5 of 6 PageID #: 78

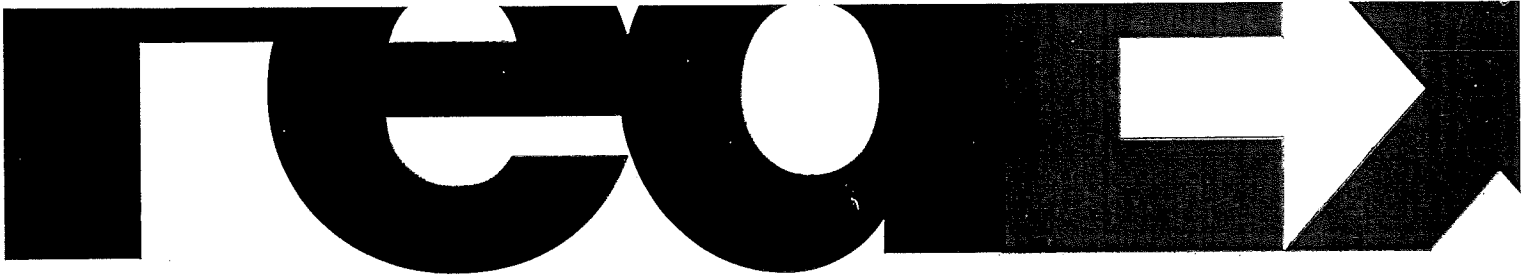
RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

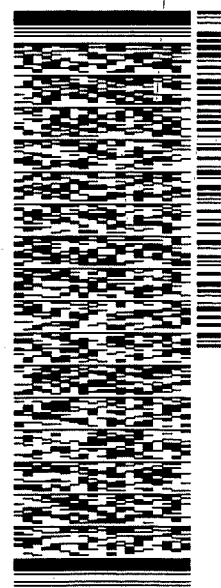
MAG. JUDGE



Express

05:22  
05:30  
06:30  
RT  
FZ  
TUL

801 BROADWAY  
RM. 800  
NASHVILLE TN 37203  
(615) 796-5488  
REF: 1  
DEPT: 1

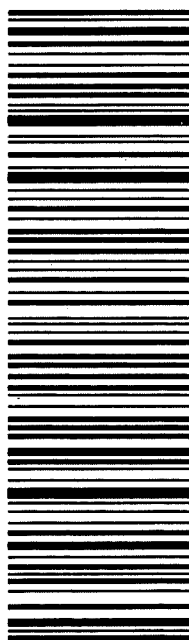


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TUE - 26 MAY 4:30P  
EXPRESS SAVER

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FILED  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TENN.  
MAY 26 2022